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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: Ex Parte presentations
PR Docket 92-235

Dear Mr. Caton:

The attached documents, The Views of the Forest Products Industry On Some of the Major Issues in PR Docket 92-235 and Mobile Radio in the Forest Products Industry, were submitted to and discussed with Mr. James R. Coltharp, Special Assistant to Commissioner Andrew C. Barrett, on February 2, 1994, by representatives of Forest Industries Telecommunications.

In accordance with Section 1.1206(a) of the Commission's Rules, two copies of those documents are submitted herewith to be associated with the public file in PR Docket 92-235.

Very truly yours,

FLETCHER, HEALD & HILDRETH

George Petrutsas
Counsel for Forest
Industries Telecommunications

GP:cej
Enclosures
cc: Mr. James R. Coltharp (w/enc.)(VIA HAND DELIVERY)

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THE VIEWS OF THE FOREST PRODUCTS INDUSTRY ON SOME OF THE MAJOR ISSUES IN PR DOCKET 92-235

I. Summary

Basic U.S. industries must continue to have reasonably assured access to the radio spectrum for private land mobile radio communications. This is particularly important for the forest products industry because it has no reasonable alternatives to private land mobile radio in the areas where the industry's operations are primarily conducted. Certain proposals in PR Docket 92-235 - where the Commission is considering to "re-farm" the private land mobile spectrum below 800 MHz - raise disturbing questions about whether U.S. basic industries, such as forest products, would indeed continue to have reasonable assurances that frequencies would be available to them when needed. Therefore, the industry is concerned.

The forest products industry agrees with the Commission's basic approach in PR Docket 92-235; that is, that the communications carrying capacity of the land mobile bands should be increased through implementation of advanced technologies. However, we believe that the Commission should follow a somewhat different path to that goal. The industry's view on some of the more important issues in PR Docket 92-235 are as follows:

II. Migration to Narrowband Technologies

We agree with the Commission's basic approach in the proceeding, which is to foster narrowband technology (i.e. channel splitting) as the primary means for increasing the communications carrying capacity of the land mobile frequencies while not

foreclosing other technologies. We agree that digital, improved access (such as TDMA), trunking, and other new technologies should be available to land mobile users, but not mandated. However, we believe that the Commission's proposal to narrow (split) the land mobile channels from 30 or 15 kHz to 5 kHz in the 150-174 MHz band and from 25 kHz to 6.25 kHz to 6.25 kHz in the 450-512 MHz band, and particularly the timetable for "migration" to those narrow channels, is unrealistic. The proposal in the docket contemplates implementing these narrow channels in 1996. This would not only be unrealistically premature, it would be highly disruptive and very costly. The conversion costs have been estimated to be several billions of dollars. And, the results may not be all that beneficial. Narrowband technology, although it is here, has not been fully proven.

Therefore, the industry recommends adoption of the alternative plans developed by the land mobile industry and submitted by the Land Mobile Communications Council (LMCC). The forest products industry participated in the development of those alternative plans through its representative organization, Forest Industries Telecommunications (FIT), a member of LMCC.

LMCC's plans contemplate commencing implementation of 12.5 rather than 6.25 kHz channelization in the bands 450-512 MHz in 1966 and completing the process gradually by January 1, 2004. The forest products industry fully supports that proposal. For the 150-174 MHz band, LMCC has developed two alternatives, Plan A and Plan B. Plan A looks to implementing 12.5 kHz channeling in the

band by January 1, 2004. Plan B looks towards implementing 6.25, rather than 12.5 kHz, by January 1, 2004. The forest products industry recommends adoption of Plan B for two important reasons. First, under that plan, the more advanced narrowband technologies would be implemented much sooner than under Plan A and there would be only one equipment changeout rather than two, thus saving the U.S. industries hundreds of millions of dollars.

III. Reallocation of "New" Frequencies

We are strongly opposed to the allocation of this newly created communications capacity to commercial carriers. It seems especially unfair to expect the private radio service users to spend billions of dollars to implement new technologies only to have the benefits given away to commercial carriers - carriers who would in-turn charge private radio users to "rent" or use "their" channels. The channels, the newly created capacity should remain with those users who are paying to create it and who desperately need additional capacity for private radio systems.

IV. Radio Service Consolidation

The forest products industry strongly opposes the proposal in PR Docket 92-235 to eliminate the existing radio services and to lump all private land mobile licensees into three broad categories. This proposal alone would seriously compromise the assurances U.S. industries now have for access to radio frequencies. The industry would prefer that the Commission retain the existing radio services. This would not only preserve the reasonable assurances

for access to the radio spectrum U.S. industries now have, it would also preserve the well-established, successful self-management systems the industries have developed for the coordination, assignment and management of the frequencies allocated to them. FIT is the coordinator of the frequencies available in the Forest Products Radio Service.

However, if the Commission concludes that the number of the existing services should be reduced, the forest industry recommends consolidation of the existing services into six groups. The recommended grouping would preserve many of the advantages of the existing systems for self-management and for frequency coordination while reducing the number of radio services. The groupings we recommend are:

Public Safety to include: Public Safety National Plan, Local Government, Police, Fire, Highway, Forestry/Conservation, Medical Emergency

Industrial/Utilities to include: Power, Petroleum, Forest Products, Manufacturers, Telephone Maintenance

Special Industrial to include: Special Industrial, Motion Pictures, Relay Press

Business to include: Business, Special Emergency (other than Medical Emergency), Private Carriers

Land Transportation to include: Railroad, Motor Carrier, Taxicab, Automobile Emergency

SMR to include: 800 SMR, 900 SMR, 220-222 Commercial and Commercial Pool below 512 MHz

V. Transmitter Power Restrictions

The forest products industry joins the overwhelming majority of those who filed comments in opposing the restrictions on power

proposed in PR Docket 92-235. Those restrictions are highly unrealistic, they would be very disruptive, costly and in fact self-defeating. They would not result in spectrum conservation because in many cases users would have to build additional facilities and use additional frequencies to achieve the coverage they need.

Instead, the industry supports the more realistic alternatives developed by land mobile user industry, including FIT, and submitted by LMCC. The industry also recommends that frequency coordinators should be authorized to require applicants to justify their coverage proposals.

VI. Other Issues

The forest products industry is also concerned about a number of other proposals, including certain frequency assignment policies (such as "vertical stacking"), some aspects of the "exclusive use overlay", allocation of a large number of VHF frequencies for "innovative shared use operation", the changes in the functions of frequency coordinators (compromise service quality so as to preserve frequencies unused), restrictions on mobile relay operations, restricting paging to paging only frequencies, limitations on itinerant operations, among others. Our concerns with those issues are discussed and alternatives are offered in the Comments the forest industry filed jointly with other U.S. industries. Copy is enclosed.

CEJ/GP/GP#10/FIT

MOBILE RADIO IN THE FOREST PRODUCTS INDUSTRY

I. The Forest Products Industry, in Brief

The forest products industry provides some of the most essential materials for the U.S. economy, wood and wood products. It manufactures the lumber for our houses and for the furnishing in those houses. It provides the paper for our books, our newspapers, our magazines. Over two billion copies of books are printed each year on paper manufactured by the forest products industry. The industry also provides the paper for the more than twenty four billion copies of newspapers printed each year and for over 350 million copies of magazines. It employs nearly 1.5 million workers and contributes over $200 billion to the Nation's GNP.

The source of the industry's products is the Nation's timberlands. There are over five hundred millions of acres of timberland in the United States. Of those, over seventy million acres are commercial, privately owned. The rest are government owned, but are available for harvesting. Tree "farms" are large as well as small. For example, there are approximately seven millions of small family owned tree farms.

Similarly, there are large, well known members of the forest products industry as well as small. Some of the large, well known companies are: Weyerhaeuser, Champion Paper, Georgia Pacific, International Paper. There are also several thousands of small, local and regional operators.

While timber is grown in many parts of the United States, the most extensive commercial forestry operations are in the Pacific

Northwest, in the Southeast, in the northeastern part of New England, particularly in Maine, and in northern Wisconsin, Minnesota, and Michigan.

Logging, by its very nature, is a very hazardous activity. Logging operations are conducted in remote, forested areas where the ordinary facilities taken for granted elsewhere are scarce or non-existent. The annual injury rate among timber workers is high, more than 20 injuries or illnesses per 100 full time workers. The felling of trees, moving them to landing sites, loading them on special trucks and other conveyances and hauling them over often primitive roads are all hazardous activities resulting in many injuries and deaths.

II. The Use of Mobile Radio in the Forest Products Industry

In the remote, forested areas where the forest products industry conducts most of its operations, mobile radio is the primary, often the sole, means of communication. The primary purpose of radio communications in the industry is to promote safety or life. It is used to summon help in emergencies and to forewarn of hazards; it helps prevent or limit the ravages of forest fires. Millions of dollars worth of timber is destroyed by fire each year. Millions of acres are also saved by quick responses and by modern fire-fighting methods in which radio plays a key role.

Radio, however, does more. It has become an essential management tool in coordinating and managing often far-flung

logging operations. It is used to send and receive timely reports, to dispatch personnel and repair vehicles, to shift resources, to deal with emergencies. It is used by helicopter crews while distributing tree seeds (a costly and dangerous job made practical through close coordination between ground and air-borne crews by radio); it is used in fertilizing the forest from the air; to guide timber appraisers to the proper spots; to talk with the lone bulldozer operator grading a new road deep into the forest; to direct crews looking for lost hikers, hunters or fishermen.

Radio is also used to control remotely many logging and transportation operations (such as cable logging); in security systems; in production processes; in signalling devices; to control intake gates; regulate speed of machines; read meters; sound warning signals (in case of fire, or theft, or release of excess noxious air pollutants); and to operate remotely cranes and conveyer belts.

In short, forest products mobile radio continuously contributes to human safety and well-being and to the protection of vital natural resources.

As in all private radio services, forest products radio systems are designed to meet the particular requirements of the particular user. The range of system designs includes very large systems with dozens of base stations and hundreds of mobile units as well as small systems used by a small contract loggers with one base and two mobile units. The typical radio system used in the industry, however, is fairly complex and may consist of three or

more control stations, one or more repeaters at high sites, twenty to forty vehicular and several portable units. Typically, in such a system, about one-third of the mobile units are installed in the licensee's log trucks, about one-third is used by forest supervisors, and the remaining are distributed among wood log loaders, wood contractors, material handling vehicles, repair and maintenance vehicles, crew buses and other service and transportation facilities. Such a system is designed for communication with several logging and transport operations over areas fifty to one hundred miles in radius. These radio communication systems must provide reliable service in rural, rugged, forested terrain, and over relatively long distances. It is the only practical modern means of communication in forestry operations. There is no adequate substitute. The radio communications requirements of the industry are met by private communications systems. Common user systems, such as cellular or SMR, can only accommodate, if at all, very few of the industry's mobile radio communications requirements.

III. Radio Frequency Requirements in the Forest Products Industry

The forest products industry was one of the pioneers in introducing mobile radio in its operations. The FCC recognized the importance of radio in the industry and established one of the earliest radio services in which to accommodate the industry's special needs. The Forest Products Radio Service was established in 1949. Today, forest products licensees have access to

approximately 150 frequencies, practically all of them available on a shared basis with several other basic industries, i.e., petroleum, power utilities, and manufacturing. They also share frequencies with the telephone industry and a few with mining, heavy construction, agriculture, and certain other miscellaneous industries. Those frequencies are mostly in the 40-50, 150-160, and 450-470 MHz bands. Although the industry is also eligible for the Industrial/Land Transportation Pool frequencies in the 800/900 MHz bands, little (if any) use of those frequencies has been made because these frequencies are not suitable for the land mobile communications systems the timber industry normally operates.

Radio systems have grown at a sustained rate despite frequency shortages and the economic slowdown in the U.S. economy generally and in the forest products industry in particular. The frequency congestion in this industry is illustrated by the following "loading" statistics:

Average number of mobiles per frequency

Area	40-50 MHz	150-160 MHz
Seattle, WA	250	157
Corvallis, OR	210	159
Medford, OR	238	109
Livingston, TX	316	192
Lake City, FL	205	122

The foregoing illustrate that the congestion on the frequencies available to the forest products industry is already severe. Therefore, additional communications capacity must be

created in the land mobile bands below 512 MHz and that the additional capacity must be made available to the basic industries, such as forest products, to which the spectrum is now allocated.

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